

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

CHITALU CHITALU, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CASAD COMPANY, INC., d/b/a TOTALLY
PROMOTIONAL

Defendant.

Case No. 3:24-cv-01975-JZ

MOTION FOR ADMISSION PRO HAC VICE OF LEIGH S. MONTGOMERY

Pursuant to Rule 83.5(h) of the Local Civil Rules of the United States District Court for the Northern District of Ohio, Joshua Sanford, counsel of record for Plaintiff, Chitalu Chitalu (“Plaintiff”), hereby moves the Court to admit Attorney Leigh S. Montgomery *pro hac vice* to appear and participate as additional counsel of records in this case for Plaintiff.

Movant represents that Attorney Montgomery is a member in good standing of the highest court of Texas, and that this Motion is accompanied by the required \$120.00 fee. Attorney Montgomery will promptly register for electronic filing with this Court upon the granting of this Motion.

A declaration from Attorney Montgomery in support of this Motion is attached.

Dated: December 23, 2024

Respectfully submitted,

/s/ Joshua Sanford

Joshua Sanford (AR Bar ID # 2001037)

EKSM, LLP

10800 Financial Centre Pkwy, Suite 510

Little Rock, Arkansas 72211

Phone: (501) 221-0088

Fax: (888) 787-2040

jsanford@eksm.com

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2024, a copy of this Motion for Admission Pro Hac Vice of Leigh S. Montgomery was filed electronically and served on all counsel of record through the electronic filing system.

/s/ Joshua Sanford

Joshua Sanford (AR Bar ID # 2001037)

EKSM, LLP

10800 Financial Centre Pkwy,
Suite 510

Little Rock, Arkansas 72211

Phone: (501) 221-0088

Fax: (888) 787-2040

jsanford@eksm.com

Counsel for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

CHITALU CHITALU, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CASAD COMPANY, INC., d/b/a TOTALLY
PROMOTIONAL

Defendant.

Case No. 3:24-cv-01975-JZ

**DECLARATION IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE OF LEIGH S. MONTGOMERY**

I, Leigh S. Montgomery, an attorney seeking to represent Plaintiff, Chitalu Chitalu in the
above-captioned matter, hereby declare as follows:

1. I make this declaration based upon my own personal knowledge;
2. I seek admission *pro hac vice* in the above-referenced matter;
3. I hereby attest that I am a member in good standing of the highest court of the State of
Texas. I was admitted to the Texas bar in 2008.
4. I hereby provide the information required by Rule 83.5(h) of the Local Rules for the
United States District Court of the Northern District of Ohio:

a. Leigh S. Montgomery
EKSM, LLP
4200 Montrose Blvd
Suite 200
Houston, Texas 77006
Phone: (888) 350-3931
Fax: (888) 276-3455

- b. I was admitted to practice before the Supreme Court of Texas on May 2, 2008,
and my Texas Bar No. is 24052214. A true and correct copy of a Certificate in
Good Standing from the Supreme Court of Texas is attached hereto.

I have never been disbarred or suspended from practice before any court, department, bureau, or commission of any State or the United States.

- d I have never received a reprimand from any court, department, bureau, or commission of any State or the United States pertaining to conduct or fitness as a member of the bar.

I declare under penalty of perjury under laws of the United States that the foregoing is true and correct.

Executed this 23rd day of December 2024 in Houston, Texas.

/s/Leigh S. Montgomery
Leigh S. Montgomery
Texas Bar No. 24052214
lmontgomery@eksm.com
4200 Montrose Blvd
Suite 200
Houston, Texas 77006
Phone: (888) 350-3931
Fax: (888) 276-3455

The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Leigh Skye Montgomery

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 2nd day of May, 2008.

I further certify that the records of this office show that, as of this date

Leigh Skye Montgomery

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 4th day of November, 2024.

BLAKE HAWTHORNE, Clerk

Blake A. Hawthorne
Clerk, Supreme Court of Texas

No. 1629C.1